

STATE OF ALASKA

DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER

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August 26, 2003

Mr. Bruce Rogers
BLM Glennallen Field Office
P.O. Box 147
Glennallen, AK 99588

RE: Eastern Alaska Resource Management Plan and Environmental Impact Statement,
Agency Scoping Comments

Dear Mr. Rogers;

The State of Alaska appreciates the opportunity to offer comments and provide information in support of preparation of the Bureau of Land Management (BLM), Eastern Alaska (EAK) Resource Management Plan/Environmental Impact Statement (RMP/ EIS) pursuant to 43 CFR 1610.3-1. The planning area covers public lands in eastern southcentral Alaska from the Alaska/Canada border south of the Alaska Range, west to the vicinity of Denali National Park near Cantwell.

The planning effort covers a large area with many unique characteristics and concerns as well as many valuable resources. We recognize that the RMP is a land use decision-making document that provides overall guidance for management decisions in this extensive area and as a result many of the State's comments will be somewhat general in nature.

GENERAL MANAGEMENT ISSUES:

State Planning Efforts and Management Responsibilities

The Alaska Department of Natural Resources has the primary management responsibility for management of state lands including the land, water, tidelands, and shore lands of navigable waters within the state. This authority includes navigable waters, tidelands, and shore lands within the exterior boundary of federal lands, including Conservation System Units (CSU's) created under the Alaska National Interest Lands Conservation Act.

The Department of Fish and Game serves as the primary agency responsible for management of fish and wildlife on all lands in Alaska regardless of ownership. Clarification of this role and a commitment to cooperate in related matters is addressed in the Master Memorandum of Understanding between the Bureau and the Department. The State requests that the respective roles and a BLM commitment to cooperation in issues that affect each other's responsibilities be

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fully recognized in the plan. Specifically, the state requests that the plan and planning process fully recognize the state's authorities that overlay BLM's land management responsibilities.

We appreciate BLM's stated intent, consistent with direction provided in 43 CFR 1610.3-2, to make the Eastern Alaska RMP/EIS compatible or consistent with the State or local land use plans that address lands adjacent to BLM's. Many of the parcels in the planning area are state selected. It is in the public interest that the management transition be as seamless as possible when conveyance occurs. The State requests that the planning process avoid making decisions that unnecessarily encumber state selected lands. Even prior to conveyance, BLM management intent for selected parcels should be as consistent as possible with state management intent. Under ANILCA 906(k), the State must concur with authorizations on state-selected lands. State concurrence is based on DNR plans as well as other state policies, regulations and statutes that address selected parcels.

While BLM retains management responsibility for selected lands, the State requests that the appropriate Native corporation and/or the State of Alaska be contacted, and their views considered, prior to implementing a more specific management program or issuing a permit involving these lands. In addition, any fees collected for special use or right-of-way permits should be held in escrow until the selected lands are conveyed or relinquished, consistent with ANILCA Sec. 906(k)(2).

We also ask that BLM carefully review DNR area and management plans that address BLM lands that are state selected and topfiled. Area and management plans include decisions on how state selected lands are to be managed when they are conveyed. Of particular concern are state-selected lands that have been identified as a high priority for conveyance and are likely to be state owned over the long term. The State Conveyance Priority List can be viewed at <http://www.dnr.state.ak.us/mlw/title/index.cfm>. Consistent with 43 CFR 1610.3-2, we expect that the Eastern Alaska RMP/EIS will not develop management intent for these parcels that deviates significantly from the existing DNR land use plans. This is particularly important for those state-selected lands located within legislatively designated areas (LDA's), such as State Parks, Forests, Refuges and Critical Habitat Areas. A complete list of such areas is located at: www.dnr.state.ak.us/landrecords/docs/ldafct97.pdf and is attached for your reference. Some of these LDA's have management plans (listed below) that specify management intent in addition to their enabling legislation, but many others do not.

Direction for management of general state lands is derived from DNR Area Plans. Resource Elements are developed in advance of each Area Plan. They describe the resources and uses that occur within planning areas and focus on topics such as fish and wildlife, recreation and tourism, cultural resources, timber, settlement, and transportation.

Management Plans provide more detailed management intent for legislatively designated areas, smaller geographic areas and certain resources. Unlike Area Plans, Resource Elements for Management Plans are generally incorporated into the final plan.

DNR Plans relevant to the Eastern Alaska RMP can be found at the DNR website.

www.dnr.state.ak.us/mlw/planning/index.htm¹

Areas below have published area or management plans:

Area Plans (ADNR)

- Susitna
- Tanana Basin
- Copper River Basin
- Prince William Sound
- Yakataga

Management Plans (ADNR – Mining Land and Water)

- Denali to Wrangell – St. Elias Assessment and Management of Scenic Resources along the Highways between Denali and Wrangell – St. Elias National Parks.

Management Plans (ADNR – Forestry)

- Yakataga Special Management Area
- Susitna Forest Guidelines

Management Plans (ADNR – State Parks)

- Denali State Park (and South Side Development Concept Plan and EIS)
- Alaska Recreational Trails Plan
- State Marine Parks – Prince William Sound
 - Canoe Passage State Marine Park
 - Jack Bay State Marine Park
 - Kayak Island State Marine Park
 - Sawmill Bay State Marine Park
 - Shoup Bay State Marine Park
- Statewide Comprehensive Outdoor Recreation Plan – Alaska’s Outdoor Legacy

Management Plans (ADFG - State Refuges)

- Yakataga State Game Refuge

Management Plans (ADFG State Critical Habitat Areas)

- Copper River Delta Critical Habitat Area

Game Management Units

- 5 (B)
- 6 (A, B, C, D)
- 11 (Z)
- 12 (A)
- 13 (A, B, C, D, E)

¹ Click on the links at the bottom of the left column for management plans. All area plans and some State Park plans are on line. ADFG plans for the LDA's they manage are not on line.

A Wolf Predation Control Implementation Plan is established on state lands only in GMU 13 to maintain specific moose population objectives.

Many of the above referenced plans have been provided to the Glennallen Field Office both digitally and in hard copy. The State will be happy to assist BLM with acquisition of any additional documents, associated resource elements, or maps that may be of assistance in this planning effort.

For legislatively designated areas, such as the Nelchina Public Use Area, within the planning area that do not have management plans, management intent can be found in the enabling legislation for each and the policies, regulations and statutes that apply to the DNR or DFG divisions that management them.

It should also be noted that criteria for the selection of special fishery management areas were adopted into regulation statewide in 1998 in 5 AAC 75.013 under the authority established under the Board of Fisheries AS 16.05.251. Special trout management areas include 19 Catch-and-Release areas, 6 fly fishing only areas, and 26 unbaited single-hook areas. Additional information can be found at the ADF&G website (<http://www.sf.adfg.state.ak.us>) .

So that BLM planners are better versed on management intent for state lands in and adjacent to the planning area, a brief compilation of the land and resource management tools that the state and municipal governments may apply to public activities involving state land, water, and related use of fish and wildlife resources is attached.

In addition, resources developed by the Alaska Department of Fish and Game may prove useful in analyzing fish and wildlife habitat, distribution, and use within the planning area. Documents that may be of assistance include:

Alaska's Wildlife and Habitat, ADF&G, Jan. 1973.

Alaska Habitat Management Guide, Southcentral Region Map Atlas, ADF&G, 1985.

Anadromous Waters Catalog, ADF&G, 1999.

In addition to landowner management plans, we recommend BLM consult and integrate the planning documents of local governments, particularly their coastal management plans. While these plans vary considerably in content and coverage over the range of the Eastern Alaska planning area, many coastal plans include detailed resource inventory and analysis sections.

Additional information about coastal districts, as well as contact information, is available through the Alaska Coastal Management Program in the Department of Natural Resources Office of Project Management and Permitting. The Department of Community and Economic Development maintains another valuable source of detailed community information using an on line database. This site also contains detailed community profile maps stored in the "Mr.Sid" compression format that may prove useful in reviewing land status and existing infrastructure.

Coastal Zone (<http://www.gov.state.ak.us/dgc/Explore/Tour.html>)

Economic Development (http://www.dced.state.ak.us/cbd/commdb/CF_COMDB.htm)

Attachments

Map: Alaska Coastal Management Program Special Area Plans

Map: Alaska Coastal Zone Districts

Map: State of Alaska, Legislatively Designated Areas, Index Map (lda1040.pdf)

Fact Sheet: State of Alaska Legislatively Designated Areas

Fact Sheet: Nelchina Public Use Area (Nelchina_pua.pdf)

Document: Coastal Zone Definitions

Document: Select State Tools for Managing State Land/Water and Related Public Activities
involving Fish and Wildlife Resources (1/03)

Website: Land Records.info (<http://www.dnr.state.ak.us/cgi-bin/lris/landrecords>)

RS 2477 Rights-of-Way

The State of Alaska claims numerous roads, trails and paths across federal lands under Revised Statute 2477, a section in the Mining Act of 1866 that states, “The right-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted.” Revised Statute (RS) 2477 was repealed by the Federal Land Policy and Management Act of 1976, subject to valid existing claims. The rules for determining valid claims are still a matter of some dispute.

The State of Alaska has identified a number of routes it believes qualify as RS 2477s throughout the state. Through state legislation, Alaska identified a total of 659 RS 2477s routes as of January 2003. In addition to specific routes, the State of Alaska also claims section line easements under RS 2477. In the absence of specific regulation or law, the validity of all RS 2477 rights-of-way is determined on a case-by-case basis, either through the federal courts or by legally binding agreement of all landowners.

The State requests that all easements and rights-of-way be identified and recognized in this planning effort. We recognize that this does not constitute a final determination but request that BLM work with the state to pursue a recordable disclaimer of interest on the part of BLM for the rights-of-way in this planning area.

Attachments:

Map: State of Alaska RS 2477 Trails, March 2001.

Map: State of Alaska, Proposed Access Corridors with Significant Subsurface Mineral Resource Areas.

Map: General Land Status with Mineral Resources & Mining Claims and Historical Transportation Routes, Southcentral, Alaska. 2001. (minrssc8.pdf)

Section 17(b) of the Alaska Native Claims Settlement Act Easements

Section 17(b) of the Alaska Native Claims Settlement Act of December 18, 1971, authorizes the Secretary of the Interior to reserve easements on lands conveyed to Native corporations to guarantee access to public lands and waters. Easements across Native lands include linear easements (e.g., roads and trails) and site easements. Site easements are reserved for use as

temporary campsites and to change modes of transportation. They can be established at periodic points along the course of major waterways flowing through Native lands, along coastal areas, and at junctions of roads and trails. The size, route, and general location of 17(b) easements are identified on maps filed with conveyance documents. Conveyance documents also specify the terms and conditions of use including the acceptable periods and methods of public access.

The State requests that 17(b) trail and site easements be recognized and mapped as part of this planning process so that the public is aware of their location. We hope this will reduce trespass problems and assist the public in gaining legal access to public use areas. In the event that 17(b) easements are proposed for termination, the State requests that interested parties, including the State of Alaska be given adequate public notice and opportunity to participate and comment.

Navigable Waters

Lands beneath tidelands and inland navigable waters were granted to the State of Alaska by the Equal Footing doctrine, the Submerged Lands Act of 1953, and the Alaska Statehood Act of 1958. If water bodies, both inland and marine, were reserved or withdrawn by the Federal government prior to statehood on January 3, 1959, lands beneath these waters may have been retained by the United States. Within this framework, if a water body is navigable, the bed of the river or lake belongs to the State of Alaska. If a water body is not navigable, the bed of the water body belongs to the adjacent landowner(s). Determination of what waters are navigable or non-navigable is an on-going process in Alaska at both the administrative and judicial levels.

The Federal test for determining navigability was established over one hundred years ago in the landmark Supreme Court decision *The Daniel Ball*, 77 U.S. (10 Wall.) 557 (1870), a portion of which reads:

“Those rivers must be regarded as public navigable rivers in law which are navigable in fact and they are navigable in fact when they are used, or are susceptible of being used, in their ordinary condition, as highways of commerce, over which trade and travel are or may be conducted in the customary modes of trade and travel on water...”

The State requests that BLM work with the State on specific water bodies to resolve issues concerning ownership and use of rivers, lakes, and streams within BLM owned lands where management conflicts arise. Cooperative management agreements between the BLM, the State of Alaska, and other landowners may be developed when needed for specific waterways within the planning area. In situations where navigability and the ownership of submerged lands are disputed for a specific water body, the final navigability determination authority rests with the Federal courts.

Attachment:

Fact Sheet: Recordable Disclaimer of Interest: State Owned Navigable Waters
(recordable_disclaimer.pdf)

Water Rights

In general, water on BLM lands is subject to the "Water Use Act". The Department of Natural Resources shall determine and adjudicate rights in the water of the state, and its appropriation and distribution. The State of Alaska functions within the prior appropriation doctrine which allows the first appropriator of water a priority right to use water over subsequent appropriators on a "first in time, first in right" basis. A priority date is established at the time of application. On some BLM lands the state may recognize a Federal Reserve Water Right (FRWR), but only on those BLM lands where Congress or the President withdraws lands from the public domain for a specific purpose(s) (Wild and Scenic Rivers). All other BLM lands are considered part of the public domain and are not subject to FRWR. Unless otherwise specified by Congress, FRWR covers only the minimum amount of water necessary to fulfill the primary purpose of the land withdrawal. FRWR are implied until proven. Upon adjudication by the state, the priority date of a FRWR is the date the federal land was withdrawn from the public domain, and are then incorporated into the state water right system.

State Transportation Planning

Federal transportation planning regulations require each state to develop a long-range statewide transportation plan in consultation and coordination with other governmental agencies and the public. The State requests that BLM consider State transportation planning policies and documents relevant to the Eastern Alaska planning area. State transportation plans relevant to the Eastern RMP include:

- Vision 2020, the Statewide Transportation Policy Plan
- Prince William Sound Transportation Plan
- Southeast Alaska Transportation Plan
- Glenn Highway Scenic Byway Corridor Management Plan
(<http://www.dot.state.ak.us/stwdplng/areaplans/index.html>)

The State of Alaska Department of Transportation (DOT) is also responsible for state airports, transportation corridors, and the ferry system. We request the plan address potential airport expansion for both economic development and for runway expansion as population centers continue to grow and air travel needs of rural communities continue to expand, as well as access roads to such existing and future facilities. Of particular importance in this rural planning area are transportation corridors for resource development, rural airports, and harbors and docks.

The Aviation Improvement Program (AIP) makes federal funds available to the State for airport planning and construction projects. Most of the federal dollars spent in the more rural parts of this planning area fall into this category. The state therefore requests the plan support rural airport enhancements and/or expansion where needed for community and economic development. The "Copper Basin/Upper Tanana Regional Airport Plan" is due out in final form in October 2003 and will be a useful resource for this planning effort (draft anticipated on web 9/1/03).

Of particular interest to the State Department of Transportation in this planning area are the following issues:

1. Material sites – Adequate material sites should be made available where required for existing and future state and local roads and airports.
2. Rest areas, scenic viewpoint turnouts, and campground areas along existing and future roads through BLM lands by other federal agencies, state and local governments should be considered.
3. Aircraft landing areas on BLM lands commonly used by the public should be identified and, where not in conflict with land use designations, permitted by the plan.
4. Provision for the future extension of the Copper River Highway across BLM lands to connect with the state contiguous highway system should be addressed in the plan.
5. The plan should recognize the state's need for future upgrading, realignment and expansion of its transportation system.

Attachments:

Vision: 2020 Statewide Transportation Policy Plan w/ addendum

Prince William Sound Area Transportation Plan

Southeast Alaska Transportation Plan

Utility Corridors

The State requests that BLM consider the necessity of providing for the development of utility corridors, including corridors for the transport of oil and gas, as well as transportation corridors to support future economic growth in Eastern Alaska.

Attachments:

Map: State of Alaska, Proposed Access Corridors with Significant Subsurface Mineral Resource Areas.

Map: Corridor Priorities for State Ownership, State Land Selection Project. 1994. (corr0395.pdf)

Wild and Scenic River Designations and Planning

The Gulkana and Delta Rivers are already designated National Wild and Scenic Rivers and it is our understanding that the Eastern Alaska RMP will be compatible with existing management plans for these rivers. Any additional Wild and Scenic River assessment done for the Eastern Alaska plan must consider the potential land ownership pattern following completion of the state and native conveyances. Virtually all of the rivers previously identified as eligible for the National Wild and Scenic Rivers System by BLM in 1990 are in areas that are state or ANCSA selected. Therefore, it is unlikely that any rivers in the planning area are suitable for Wild and Scenic River designation.

Wilderness Studies

The State requests that BLM adhere to the policy set forth in the Memorandum from Secretary of the Interior, Gale A. Norton to the Director of the Bureau of Land Management dated April 11, 2003 and reiterated in a letter to Governor Frank H. Murkowski, also dated April 11, 2003 which states:

“Therefore, I instruct BLM to consider specific wilderness study proposals in Alaska, as part of any new or revised resource management planning effort, if the proposals received have broad support among the State and Federal elected officials representing Alaska. Absent this broad support, wilderness should not be considered in these resource management plans.”

At this time it is clear that there is a lack of broad support for further wilderness proposals. In the event that any such proposal is considered, the State requests that there be additional consultations with the state and that any areas proposed for Wilderness designation be managed consistent with the special provisions of ANILCA that amend the Wilderness Act of 1964.

Attachments:

Correspondence: Gail Norton, April 11, 2003.

Coastal Zone Consistency

The Coastal Zone Management Act of 1972, as amended (PL 92-583), directs federal agencies conducting activities within the coastal zone or that may affect any land or water use or natural resources of the coastal zone to conduct these activities in a manner which is consistent “to the maximum extent practicable” with approved state management programs.

The Alaska Coastal Zone Management Act of 1977, as amended, established policy guidance and standards for the review of projects within or potentially affecting Alaska’s coastal zone. In addition, specific policies on activities and uses of coastal lands and water resources within coastal resource districts have been developed. Most incorporated cities, municipalities, and boroughs, as well as unincorporated areas (coastal resource service areas), within the coastal zone have State-approved coastal management programs.

(<http://www.gov.state.ak.us/dgc/Explore/alldistEPS.html>)

The State requests that BLM consider approved Coastal Management plans and policies when developing recommendations for BLM lands within a Coastal Zone area.

SUBSURFACE

BLM is responsible for management of the federal subsurface mineral estate. This includes subsurface lands under other federal agency management units, and in some cases under lands where the surface is privately owned. Resource development is a priority of the State. In the Eastern Alaska Planning Area the State requests that BLM consult with the State Department of Natural Resources before taking any actions that could potentially negatively impact resource development on State lands. A general description of ongoing oil and gas development activities follows.

Oil and Gas Leasing

The State is encouraging oil and gas development in the state and would appreciate the opportunity to specifically review and comment on any proposed actions that may limit or

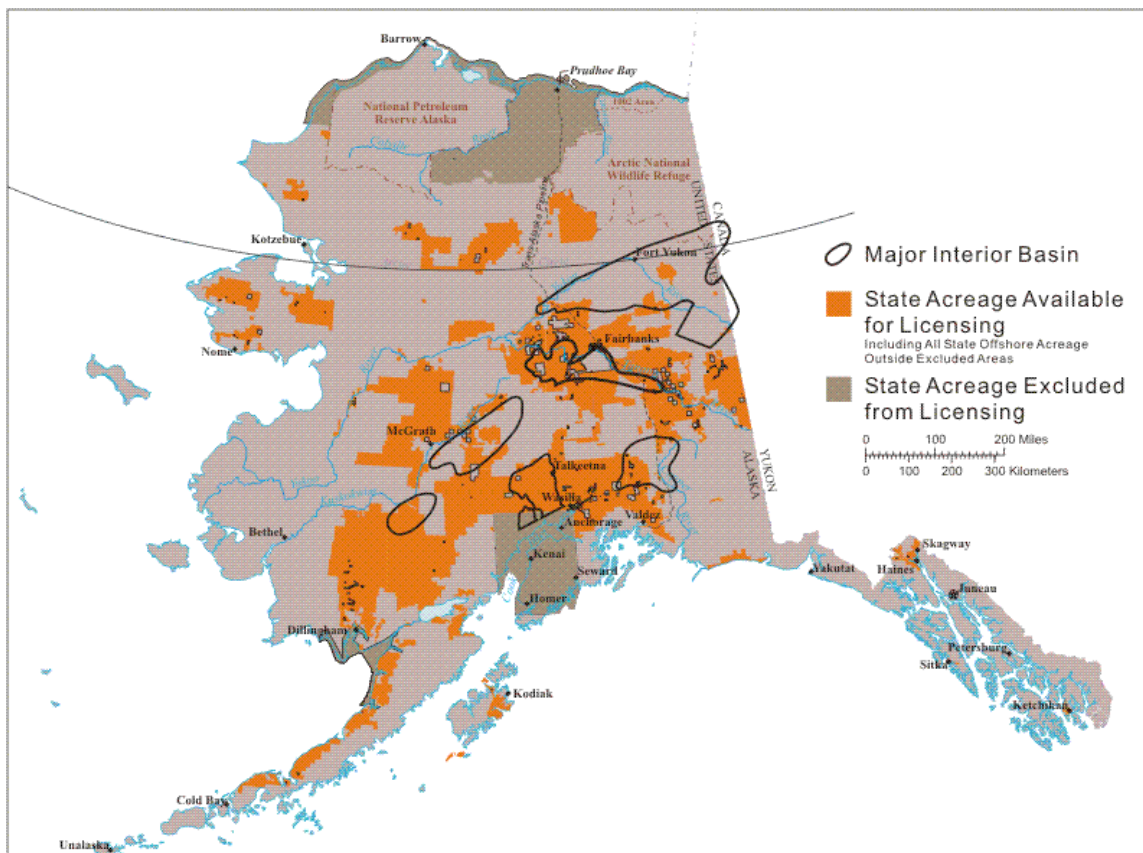
discourage exploration and development in this area. At this time there are no anticipated lease sales proposed for this area. A joint geological and geophysical study of Alaska's interior basins has recently been conducted by the State and the US Geological Survey. Results are available in digital and map form through the USGS Earth Science Information Center, 4230 University Drive, Anchorage, AK 99508.

Oil and Gas Exploration Licensing

An exploration-licensing program has been initiated by the State in order to stimulate exploration in Alaska's unexplored large sedimentary basins, particularly in portions of the North Slope, Cook Inlet and interior Alaska. This program is designed to complement the oil and gas leasing program.

An area between 10,000 to 500,000 acres can be selected for Exploration Licensing. A license is awarded to the applicant who has committed the most dollars to an exploration program. There is a \$1.00 per acre licensing fee with no additional charges during the term of the license, which can be for a period up to 10 years. During the term of the license any portion of the licensed area may be converted to an oil and gas lease, with terms extending beyond those of the license.

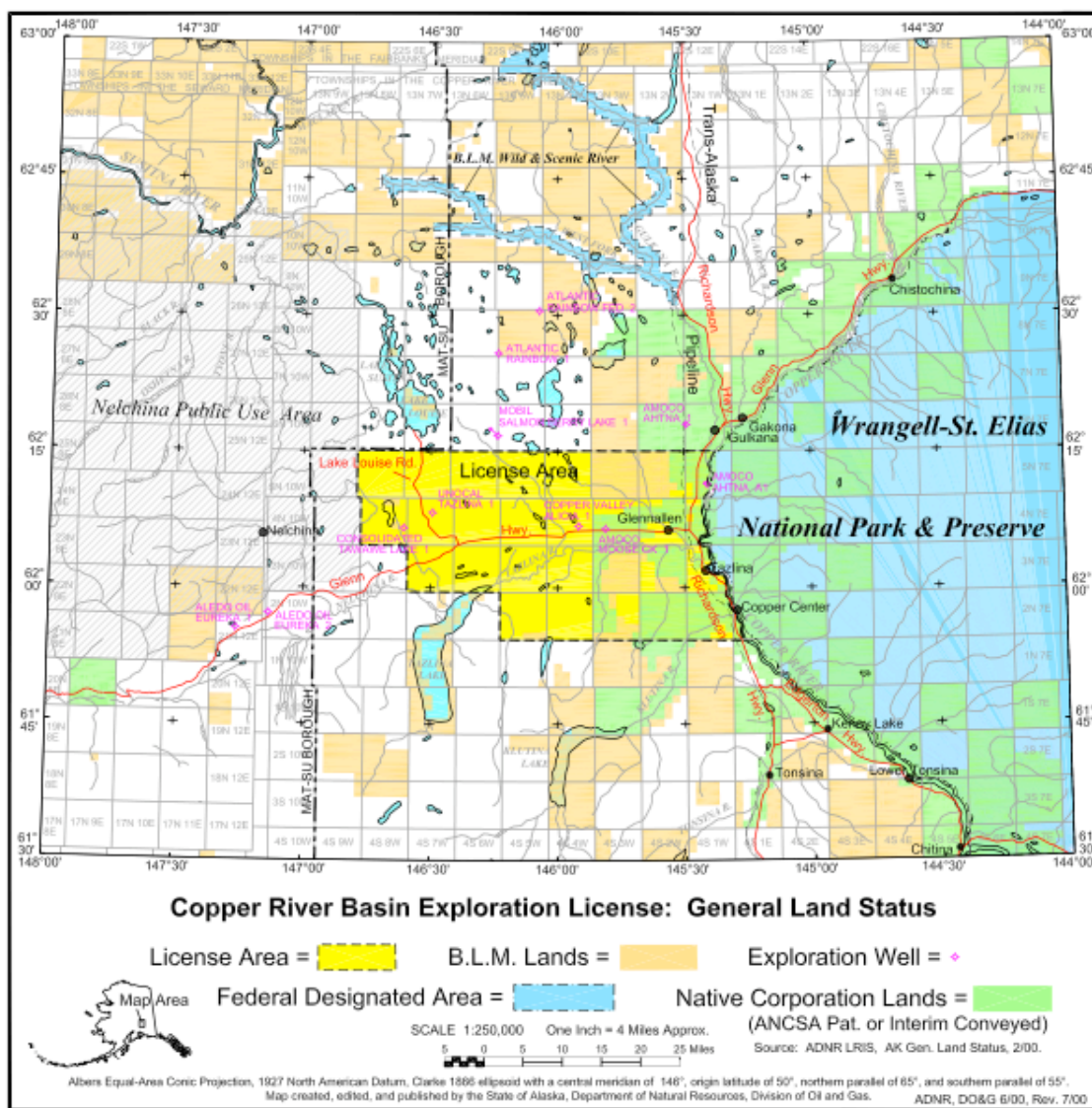
The licensing process is an annual process, initiated by applicants during the month of April each year or at the Commissioner's discretion a notice requesting submittal of proposals may be issued at any time.



Department of Natural Resources, Oil and Gas Exploration Licensing

On July 25, 2000, the Director of DNR Division of Oil and Gas issued a Final Finding relative to Copper River Basin Oil and Gas Exploration Licenses. DNR issued exploration licenses on approximately 398,445 acres within the Copper River Basin “study area” (see following map) of approximately 1.5 million acres. The license area is bounded on the south by Township 1N, on the north by Township 6N and on the east by the Copper River.

Additional information specific to the current Copper River licensing process can be found on the Division of Oil and Gas website. (<http://www.dog.dnr.state.ak.us/oil/programs>)



Attachments:

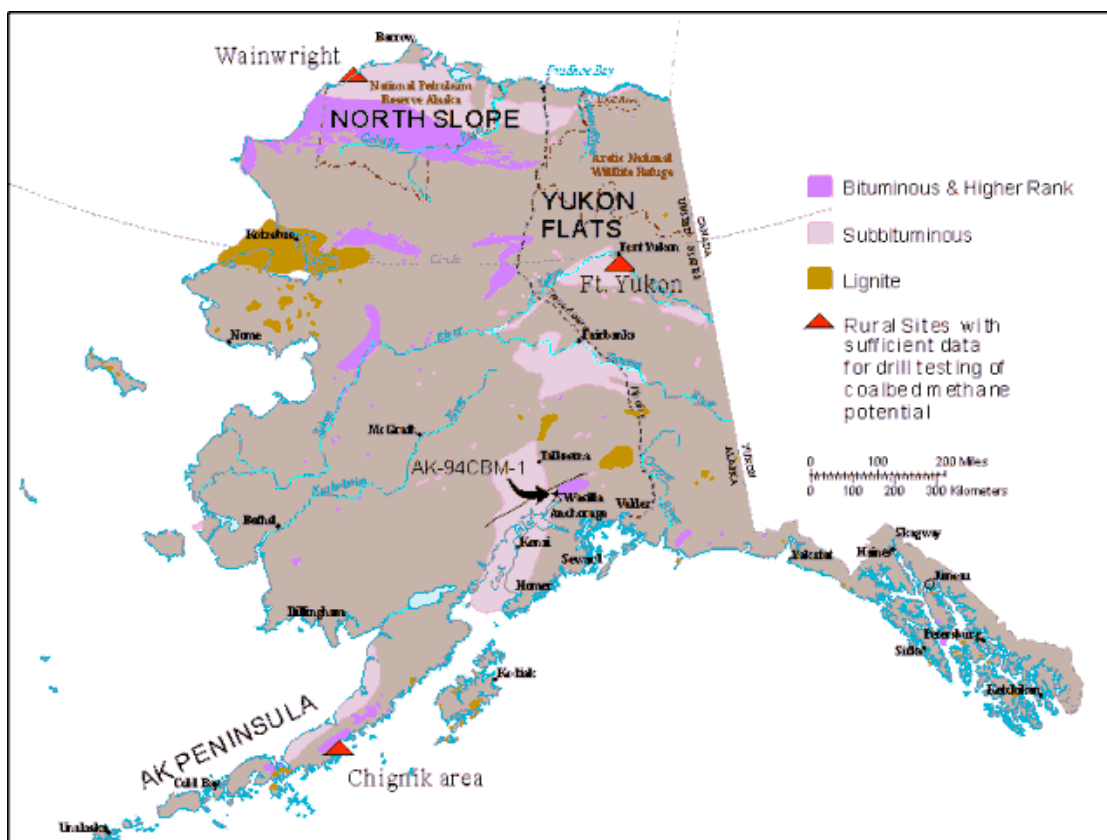
Document: Oil & Gas Licensing Program, 2003.

Coalbed Methane

Alaska's hypothetical coal resources exceed 5.5 trillion short tons and may contain up to 1,000 TCF (trillion cubic feet) of gas. The coal resource varies in rank from bituminous to lignite, and formed in extensive Cretaceous to Tertiary aged basins throughout the state. Economically producible coalbed methane is an attractive alternative to diesel fuel, the main energy source for home heating and electricity throughout much of rural Alaska.

In 1994, the Division of Oil and Gas drilled the state's first coalbed methane test well near the town of Wasilla. The well (AK-94CBM-1) was drilled to a depth of 1,245 feet (380 m), continuously coring the Tertiary-age Tyonek Formation from 354 feet (108 m) to total depth. Eighteen seams of high-volatile C bituminous coal were encountered, the thickest being 6.5 feet and a net coal thickness of 41 feet. Thirteen of these seams were sampled for gas content.

The Division of Geological and Geophysical Surveys embarked on a multi-year study to determine whether coalbed methane could serve as a local energy source in rural Alaska. Three coal basin sites were selected using a coalbed methane producibility model developed by the Texas Bureau of Economic Geology: 1) western North Slope near Wainwright, 2) Yukon Flats at Fort Yukon and, 3) Alaska Peninsula near three Chignik Bay communities. Each site has the potential for thick beds of coal or lignite. These sites also present a cross section of the extreme climate and drill rig access problems that would face any coalbed methane development program in Alaska.

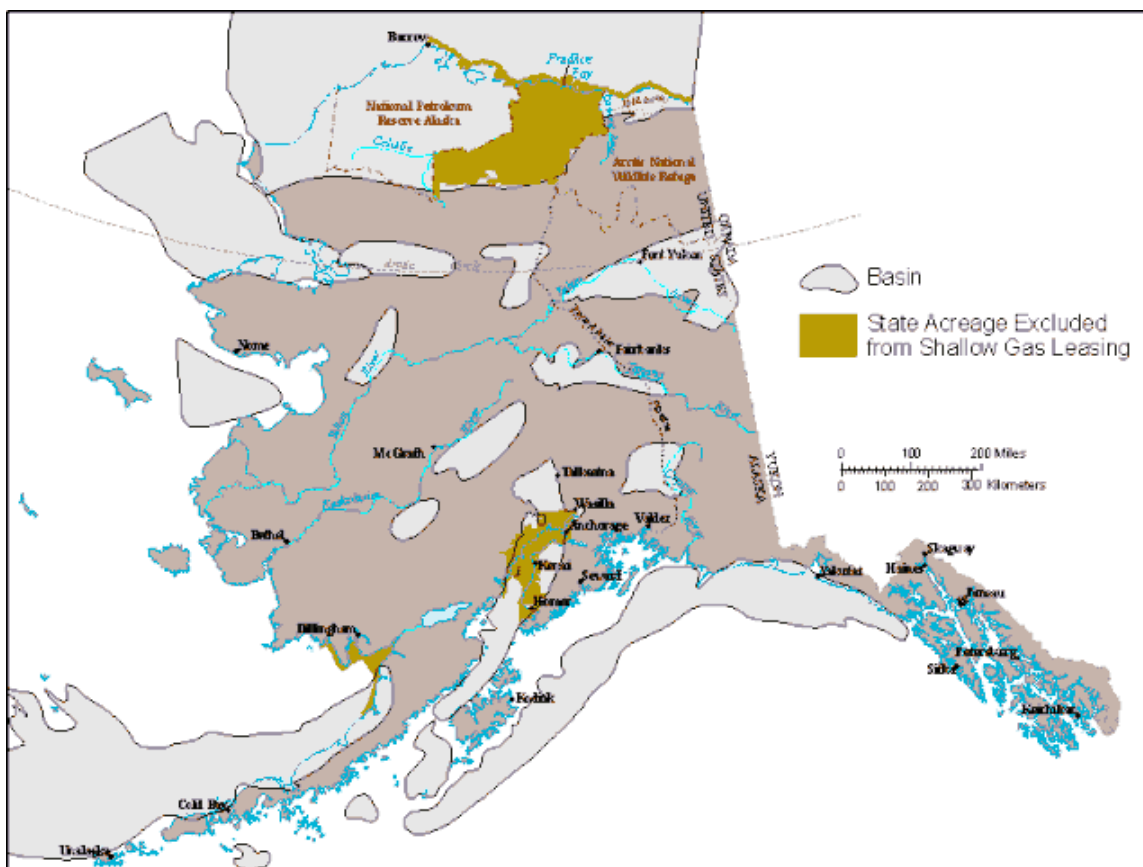


Coal Bed Methane Study, Alaska Division of Geological & Geophysical Surveys

DGGS, in cooperation with the U.S. Geological Survey, is developing a drilling program that will assess the gas producibility for each of these sites. This program proposes drilling two exploratory wells at each site, conducting geologic and hydrologic testing of the wells, initiating water pumping to stimulate gas flow testing, and initiating a pilot test to determine the presence of gas resources.

Shallow Gas Leasing

Shallow Natural Gas Leasing provides for non-competitive leases to explore for and develop natural gas reservoirs (including coalbed methane) from fields if a part of a field is within 3,000 feet of the surface. The intent of this program is to locate local sources of gas that can then be delivered to consumers in remote areas of the state. This lease does not allow for exploration for oil. In general, in the Eastern Alaska planning area, these lands are located in an area between Talkeetna and Wasilla, around Glennallen, and the shoreward edge of the Gulf of Alaska from Yakataga to the Copper River delta.



Shallow Gas Leasing, Alaska Department of Natural Resources

Mining

There are many mineral prospects, operating mines, placer districts and coalfields located within the Eastern Alaska RMP planning area. While these mineralized areas are among the most readily accessible in the state, the state requests that access for transportation and utility infrastructure

to these mineralized areas be considered. Planning for BLM lands located near or adjacent to these mineralized areas should take into consideration the need for flexibility in planning for access and supporting infrastructure based on land ownership and physical characteristics of the terrain. Year-round access within the RMP utilizing existing access trails as much as possible will reduce the need for large helicopters to move supporting equipment and materials as exploration and development continues.

In areas such as the Valdez Creek mining area and other mineralized areas along the Alaska Range and in the Talkeetna Mountains, it is important that state planning intent as specified for selected lands in existing management plans be considered as BLM develops planning recommendations for these areas. The state is interested in encouraging exploration and development of mineral resources in these areas. The “Denali Block” area is being actively explored for prospective nickel/copper/platinum group metals. This area contains a group of intrusive and extrusive rocks that contain many known occurrences of nickel, copper, platinum group elements, as well as gold and lead.

Areas experiencing considerable mineral exploration and development include the following mines and placer districts, with a very brief issue description:

- **Golden Zone** – Broad Pass area south of Cantwell, is the site of a potential mine development. Access to this area is important to the state.
- **Butte Lake** [located just west of the western boundary of the Valdez Creek Mining District (T20S, R3W, FM)] – This is a newer prospect with access occurring over BLM/State Selected lands via recreational trails. Access needs to be maintained.
- **Valdez Creek** – This gold mining district experiences significant amounts of mining activity by small operators and has relatively good existing access. Access should be preserved.
- **Denali Block** – This area is experiencing significant platinum exploration with good potential for development. Access to this area north of the Denali Highway between the Maclaren River and Summit Lake will need to be improved should a major mine development be undertaken. Consideration should be given to maintaining the potential for development of transportation routes running north from the Denali Highway traversing alongside the Maclaren River and running along the west side of Landmark Gap. An additional access route running north could be considered between Tangle Lakes and Summit Lake.
- **Nelchina Placer District** – This area is located within the Nelchina Public Use Area. Access in this area is adequate.
- **Chistochina, Mentasta,** - These areas experience moderate activity and access is adequate.
- **Valdez, Prince William Sound, Yakataga, Tonsina.** - Mining activities are occurring in these areas and in general access is adequate. No other issues have been identified.

Additional information regarding mineralized areas can be obtained from the Division of Geological and Geophysical Surveys (DGGs) in Fairbanks. The DGGs website has an extensive on-line publications section. (<http://www.dggs.dnr.state.ak.us/pubs.html>)

Attachments

Map: Proposed Access Corridors with Significant Subsurface Mineral Resource Areas.

Map: Generalized Geologic Map of Alaska, (pdf)

Data: Zipped shape files for Generalized Geologic Map of Alaska.

Map: Map of Prospective Mineral Areas and Significant Mineral Resources, 1999.

Map: Map of Alaska's Coal Resources, 1986. (SR37-SH1.SID)

Map: Oil and Gas Basins Map of Alaska, 1983. (SR-32_SH1.SID)

Map: Map of Selected Mines, Reserves and Resources in Alaska, 1992.

(PDF92-16-SH1.SID)

Map: General Land Status with Mineral Resources & Mining Claims and Historical Transportation Routes, Southcentral, Alaska. 2001. (minrssc8.pdf)

Publication: Alaska's Mineral Industry Report, DNR, DGGs, DECD

Publication: Opportunities in Alaska Coalbed Methane

Publication: Coalbed Methane-Potential Energy Source for Rural Alaska (0106news.pdf)

Publication: Information Circular 11, Publications Catalog of Geological and Geophysical Surveys, Fourth Edition 1996 with Addenda, 1996-1999, and 2003.

SURFACE USE

Recreational Use

The State's primary recreational interest in BLM lands, or state-selected BLM lands, is continued recreational access both motorized and non-motorized. Equally important is management of these lands so that land and resources are accessed responsibly by the public. The State's goals and objectives relative to recreation can be found in the Statewide Comprehensive Outdoor Recreation Plan included on the attached CD for your reference. The publication Generally Allowed Uses on State Land should be considered in developing management recommendations for state-selected lands.

To briefly summarize, in this planning area, the state selected lands to the north of the Denali Highway in the Clearwater Mountains are some of the most accessible lands in the state for hunting (particularly caribou and moose) and highway oriented recreation. The Gulkana River is a very popular recreational river which is being addressed through a joint State / BLM Wild and Scenic River planning process. Access to state selected lands adjacent to the Gulkana Wild and Scenic River Corridor is an important consideration for the state. The Nelchina Public Use Area and the Copper River area provide important recreational opportunities enjoyed by many for hunting, fishing, biking, floating and hiking. Lands in Prince William Sound provide many opportunities for commercial sport fishing and commercial recreation. It is important that these economic and recreational opportunities are considered through the planning process and that access to state lands and resources be ensured.

Attachment: Alaska Recreation Trails Plan (2000)
Statewide Comprehensive Outdoor Recreation Plan
Fact Sheet: Nelchina Public Use Area (Nelchina_pua.pdf)
Fact Sheet: Alaska Heritage Trails Program (heritage_trails.pdf)

Off Highway Vehicle (OHV) Activity

The public lands of the study area receive some of the most intensive off road vehicle use of any area in Alaska. The Nelchina Basin receives heavy subsistence and general hunting activity for a variety of big game species. Access to remote areas of the region is largely accomplished by off road vehicles through an extensive trail system. The proximity to large human population centers, open terrain and a variety of big game species contribute to making this area extremely popular for off road vehicle use.

While the state is concerned about protecting continued access to state-owned land and water, BLM should also consider management options that protect federal land from significant impacts from OHV use in sensitive areas. State-selected lands should be managed consistent with DNR policies as outlined in the DNR fact sheet “Generally Allowed Uses on State Land”:

“Using a highway vehicle with a curb weight of up to 10,000 pounds, including a four-wheel-drive vehicle and a pickup truck, **or using a recreational-type vehicle** off-road or all-terrain vehicle with a curb weight of up to 1,500 pounds, including a snowmobile and four-wheeler, on or off an established road easement, if use off the road easement does not cause or contribute to water quality degradation, alteration of drainage systems, significant rutting, ground disturbance, or thermal erosion. An authorization is required from ADF&G for any motorized travel in fish bearing streams. (Curb weight means the weight of a vehicle with a full tank of fuel and all fluids topped off, but with no one sitting inside or on the vehicle and no cargo loaded. Most highway rated sport utility vehicles are within the weight limit as are most ATVs, including a basic Argo.)”

Specific regulations for Legislatively Designated Areas such as State Parks, State Marine Parks, State Recreation Areas, Critical Habitat Areas, and State Refuges may be more restrictive and will be addressed in the management plan for each area. Some areas of state lands identified by the Board of Game have vehicular use restrictions for the harvest of fish and game. These areas are generally described in the Alaska Hunting Regulations by Game Management Unit. Restrictions associated with Exxon Valdez Oil Spill acquired lands are detailed in conveyance documents including recorded Conservation Easements.

Attachments: Generally Allowed Uses on State Land
EVOS Conservation Easement Summary
EVOS Restoration Habitat Protection and Acquisition Atlas
Correspondence: Sally Gibert to Bill Overbaugh, BLM September 19, 2000,
Consolidated state comments on National off-highway vehicle strategy.

Special Uses

Helicopter Operations, Commercial Recreation, Motorized Use

The Department of Natural Resources may establish Special Use Areas to regulate commercial helicopter operations on state land (i.e. in the Haines area), regulate commercial recreation activities on state land or to create and manage non-motorized areas. These Special Use Designations (SUD) establish use criteria, standards and permit requirements for certain types of activities as well as define permissible dates for various types of activities. DNR requests that BLM consult with the state prior to developing policies regarding helicopter use, off highway vehicle use, and/or commercial recreation use on state selected lands in the Eastern Alaska planning area.

Forestry

Forestry issues within this planning area generally focus on the Tanana Valley State Forest, adjacent to the planning area boundary, Delta Area Five Year Timber Sale Schedule, and fire management issues. The DNR Division of Forestry is interested in ensuring that where BLM lands are located adjacent to state lands that are not state selected, appropriate access is maintained to state or state selected lands. In addition, if a review of detailed land status identifies areas where BLM owns the subsurface and a different entity owns the surface estate, additional comments may be forthcoming, particularly with respect to access.

The state requests that fire management decisions for BLM lands be made through the existing process for updating the Interagency Copper River Basin Fire Management Plan. Of particular importance to the State is the need for updated fire planning to address the significant impacts of the spruce bark beetle infestation in the Copper River Valley. Updated vegetation mapping for purposes of identifying fire fuels would be beneficial in this planning exercise. The Division of Forestry recommends an update of interagency fire-planning taking into account:

- evacuation routes
- safe zones for the public
- update of fuels (vegetation mapping)
- public education on FIREWISE - defensible space
- tourist information
- fire response
- fuels mitigation planning

Attachments:

Forest Health Protection Report, Forest Insect and Disease Conditions in Alaska – 2002.

Websites:

Timber Sales <http://www.dnr.state.ak.us/forestry/timsales.htm>
(.jpg maps included on CD, /deltatimsales)

Forest Practices <http://www.dnr.state.ak.us/forestry/forprac.htm>

Cultural Resources

Those archaeological surveys conducted in the planning area have identified a significant number of historic properties. Much of this area has not been surveyed, however, and based upon

existing survey results one would expect to find significant numbers of historic properties within the planning area. The Tangle Lakes region is of special significance in this planning area. The Tangle Lakes area has apparently supported human occupation for the last 12,000 years and has one of the highest concentrations of archaeological sites in North America. Only portions of the area have been surveyed by archaeologists to date.

When any federal “undertaking” including any action funded or authorized by the federal government with the potential to directly or indirectly affect any archaeological or historic site is planned, a consultation with the State Historic Preservation Officer under Section 106 of the National Historic Preservation Act must be initiated. If archaeological or historic sites are identified in the project area their significance should be evaluated to determine their eligibility for inclusion in the National Register of Historic Places (36 CFR 60). In the event that archaeological or historical sites are identified through this planning process, the state requests that the State Historic Preservation Officer be notified. It should also be noted that the state may request that recreational or commercial uses be precluded in order to protect archaeological and historic sites.

OPPORTUNITIES FOR COOPERATIVE MANAGEMENT

The Division of Mining, Land and Water, Southcentral Regional Office has recently filled a position whose primary responsibility will be the Denali Block. As work focusing on this area proceeds in anticipation of conveyance to the state, opportunities for cooperation in research, trails mapping and management, and recreation management in this area and other parts of the Eastern Alaska RMP planning area may certainly be explored. The state is open to further discussions regarding cooperative management and planning through the DNR Commissioners Office, the Division of Mining, Land, and Water Resource Assessment and Development Office, the Department of Fish and Game and other agencies where appropriate.

OTHER ISSUES

Withdrawals

The State asks that all federal withdrawals be identified and mapped, and the purpose for each withdrawal be noted either in annotation or the map legend. It has been suggested that the RMP planning effort presents an appropriate opportunity for BLM to review all PLOs and withdrawals and remove those where the intended purposes are no longer present, particularly in those areas where resource development could potentially occur.

Land Exchanges

While there may be some opportunities for land exchanges to create consistent ownership and management patterns, it has been our experience that exchanges generally have a low success rate and require significant financial and staff resources to implement. The Copper River Basin Area Plan identifies several previous land exchange and cooperative agreement proposals (pages 4-9 through 4-11). However, at this time exchanges are not likely to be a high priority for the state.

Attachment:

Fact Sheet: State Land Exchanges (land_exch.pdf)

State Land Sales

State Land Sales are generally focused in areas identified in DNR Area Plans for Settlement. The state has several types of disposal programs. At present two programs are being utilized. The first is a land sale program that initially makes state land available for sale through auction and then, if not sold, parcels become available over the counter for public purchase by Alaska residents. Remote recreational cabin sites are also available through a staking program. Details of these programs can be found on the web at <http://www.dnr.state.ak.us/mlw/landsale/index.htm>.

Attachments:

Fact Sheet: Land for Alaskans

Fact Sheet: Remote Recreational Cabin Sites (remote_cabins.pdf)

Website: Subdivisions in the Southcentral Region, Over the Counter Sales

(http://www.dnr.state.ak.us/mlw/landsale/otc/subdiv_sc.cfm)

SUMMARY:

In conclusion, the following key issues have been identified by many of the departments and programs offering input and information for this planning process. This is not to diminish the importance of the many suggestions and concerns articulated through this letter but rather to briefly summarize the most commonly expressed issues.

- State and native selections should be identified in the plan.
- DNR Area Plans establish management intent for state-selected lands. The State requests that BLM adopt the management intent for state-selected lands from the area plans for these areas.
- If there are any BLM lands adjacent to state land that are not state-selected, appropriate access should be maintained through these areas.
- Reasonable consistency or compatibility in terms of management will minimize user conflicts and confusion.
- If detailed land status identifies any areas where BLM owns the subsurface estate and a different entity owns the surface estate, we would like to know where these areas are before making final comments, particularly with respect to access.
- The State requests that BLM recognize existing state authorities relative to fish and wildlife management.
- The State requests that BLM recognize the State's need to facilitate resource development and utilize the state's land base for multiple use.

The State appreciates the opportunity to offer initial scoping comments for the Eastern Alaska Resource Management Plan/Environmental Impact Statement. We recognize that the process of organizing planning teams and defining the roles of participants is an ongoing process, and that future planning processes will build on the success and failures of previous planning efforts. The State appreciates the Glennallen Regional Office's efforts to ensure close and consistent

coordination throughout all phases of the planning process in order to address questions and facilitate resolution of issues as early as possible.

Thank you again for the opportunity to comment. Should you have any questions or concerns, please feel free to contact me at your earliest convenience.

Sincerely,

/ss/

Carol Fries
State RMP Project Coordinator

Attachments:

Hard Copy

Fact Sheet: Generally Allowed Uses on State Land, DNR
Fact Sheet: State of Alaska Legislatively Designated Areas, DNR
Select State Tools for Managing State Land/Water and Related Public Activities Involving Fish and Wildlife Resources, DRAFT 1/03
ADF&G Scoping Comments, Letter from John Westlund to Carol Fries, July 22, 2003.
Exxon Valdez Oil Spill Restoration, Habitat Protection and Acquisition Atlas, 1999.
Correspondence, Gail Norton, April 11, 2003.

CD ROM: eastak_state (Directory Structure)

eakstateplans

Alaska's Coastal Zone and Coastal District Boundaries (dgc1a.pdf)
Alaska Coastal Zone Management Program Special Area Plans (dgc4f.pdf)
Coastal Zone Boundary Definitions (Dist_Cstl_Zone_Defs.pdf)
Generally Allowed Uses on State Land (gen_allow_use.pdf)
State of Alaska Legislatively Designated Areas Index Map (lda1040.pdf)
State of Alaska Legislatively Designated Areas (ldafct97.pdf)
Fact Sheet: Nelchina Public Use Area (Nelchina_pua.pdf)
Fact Sheet: Recordable Disclaimer of Interest: Alaska's Navigable Waters (recordable_disclaimer.pdf)
Exxon Valdez Oil Spill Restoration, Habitat Protection and Acquisition Atlas, 1999. (evoshabitatatl.pdf)
Easement Summary; EVOS acquisitions. (easementsummary.pdf)
Yakataga State Game Refuge Management Plan (yakatagarefugeplan)

eakaccess

Vision 2020 Statewide Transportation Policy Plan (2020sectionone.pdf)

Addendum One to the SE Alaska Transportation Plan (addfinal22701.pdf)
 Southeast Alaska Transportation Plan (satp_2nd_printing.pdf)
 Prince William Sound Transportation Plan (pwsfinal7-01.pdf)
 State of Alaska RS2477 Trails (rs2milo1_1.pdf)
 Proposed Access Corridors with Significant Subsurface Mineral Resource Areas
 (corr_lode_2r.pdf)
 Glenn Highway Scenic Byway Corridor Segment Map (corridormap7.pdf)
 Corridor Priorities for State Ownership, State Land Selection Project. 1994.
 (corr0395.pdf)
 General Land Status with Mineral Resources & Mining Claims and Historical
 Transportation Routes, Southcentral, Alaska. 2001. (minrssc8.pdf)
 Fact Sheet: Alaska Heritage Trails Program (heritage_trails.pdf)

eaksubsurface *{You will need to download and install Mr. SID Viewer}*

Map of Selected Mines, Coalfields and Significant Mineral Resources of Alaska
 (mp33-SH01.SID)
 Map of Prospective Mineral Areas and Significant Mineral Resources of Alaska
 (MP38-SH01.SID)
 Map of Selected Mines, Reserves, and Resources in Alaska
 (PDF92-16-SHI.SID)
 Oil and Gas Basins Map of Alaska ((SR-32-SH1.SID)
 Map of Alaska's Coal Resources (SR37-SH1.SID)
 Generalized Geologic Map of Alaska (akgeomap2000.pdf)
 Data: Zipped shape files for Generalized Geologic Map of Alaska
 Proposed Access Corridors with Significant Subsurface Mineral Resource Areas
 (corr_lode_2r.pdf)
 Alaska's Mineral Industry 2002: A Summary (IC49.pdf)
 Opportunities in Alaska Coalbed Methane (MP42.PDF)
 Coalbed Methane-Potential Energy Source for Rural Alaska (0106news.pdf)
 Copper River Exploration License: General Land Status (cr_area_map.pdf)
 General Land Status with Mineral Resources & Mining Claims and Historical
 Transportation Routes, Southcentral, Alaska. 2001. (minrssc8.pdf)
 Information Circular 11, Publications Catalog of Geological and Geophysical
 Surveys, Fourth Edition 1996 with Addenda, 1996-1999, and 2003.
 (IC11.PDF, IC11Addenda.pdf, and IC11PDFAdenda.pdf)
 State of Alaska, Five-Year Oil and Gas Leasing Program, January 2003
 (1_5YR_PROGRAM_NEW_03.pdf)

eaksurface

Generally Allowed Uses on State Land (gen_allow_use.pdf)
 Special use Designation ADL 1076939, Haines Area Areas of Heli-Skiing Use and
 Non-Use (mapheliski.pdf), (hsfpappenkheli.pdf)
 Alaska's Outdoor legacy, Statewide Comprehensive Outdoor Recreation Plan
 (scorp.pdf)

Fact Sheet: Remote Recreational Cabin Sites (remote_cabins.pdf)

Fact Sheet: State Land Exchanges (land_exch.pdf)

Fact Sheet: Land for Alaskans (land_for_ak.pdf)

Alaska Recreational Trails Plan, October 2000 (trlplan.pdf)

Forest Health Protection Report– 2002. (fhp_condit_rept_2002.pdf)

Delta Timber Sales (directory, with 7 .jpg maps)